

Off-Road Implementation Advisory Group (ORIAG) Meeting



**March 29, 2010
Sacramento, CA**

California Environmental Protection Agency

Air Resources Board



This meeting is being webcast
and recorded.

ORIAG members may email
mbaker@arb.ca.gov during this meeting
for comments and questions.

There is a Public Comment period near
the end of this meeting.

Agenda

- 9:30 – 11:00
 - ARB Staff Presentation
- 11:00 – 12:00
 - ORIAG member suggestions for regulation changes
- 12:00 – 12:45
 - Lunch
- 12:45 – 1:30
 - Continue discussion on ORIAG member suggestions for regulation changes
- 1:30 – 2:00 (or as early as 12:45)
 - DOORS Updates
- 2:00 – 2:30
 - Public Comment Period (or as early as 1:15, depending on previous items)
- 2:30 – 2:45 (or as early as 1:45)
 - Wrapup/adjourn

ARB Staff Presentation Outline

- Enforcement Delay
- March 11 EO hearing and Future Changes
- Retrofit Visibility
- Reporting Update
- Status of Regulation Amendments Completed and In Progress

Enforcement Delay



AGC Petition

- Petition
 - Filed on January 11, 2010
 - Requested ARB:
 - Delay fleet average targets for 2 years
 - Withdraw request for authorization from U.S. EPA
- ARB Response
 - Enforcement delay
 - March 11 Executive Officer hearing

Enforcement for Performance Requirements Delayed

- No enforcement for noncompliance with emission performance provisions of the regulation until further notice :
 - March 1, 2010 large fleet requirements for vehicle retrofit and replacement
 - Limitations on adding higher emitting Tier 0 and Tier 1 vehicles
 - Requirements for new fleets to meet fleet average targets
- Fleets will not be retroactively cited for non-compliance during the enforcement delay.
- Enforcement advisory
<http://www.arb.ca.gov/enf/advs/advs414.pdf>

Some Requirements Still Being Enforced

- Portions of the regulation are enforceable
 - Reporting and Labeling
 - Idling Restriction and Idling Policy
 - Disclosure with Vehicle Sales
- Currently enforcement division is pursuing ten enforcement cases for not reporting

March 11 EO Hearing and Future Changes



Summary of March 11, 2010, Executive Officer Hearing

- Industry provided information
 - Economic growth forecast
 - Recession's impact on fleets
 - Inventory estimate
- Many fleets requested 2 to 5 year delay
 - Other potential changes identified

Future Changes

- Evaluate SIP status
 - Truck and bus regulation
 - Off-road regulation
- Use “cushion” to provide additional relief in both rules
- Maintain health benefits
- Meet SIP needs

Timeline for Future Changes

- April 22, 2010 Report to Board
 - Summary of the March 11 hearing
 - Effect of the recession on emissions
 - Progress toward meeting the SIP
 - Summary of potential revisions to both rules
- May/June 2010:
 - Workshops on revised emission inventories and proposed amendments
- July 2010: Staff proposal released
- Aug 2010 Special Board Hearing
 - Revisions to both the truck and bus and off-road reg

Retrofit Visibility



Interim Visibility Policy

- The regulation exempts vehicles from retrofitting where a retrofit would be unsafe
- CalOSHA is developing a standard for retrofit visibility (late 2010 or 2011)
- To prevent installs now that would later violate CalOSHA standards, ARB will exempt vehicles that cannot be retrofit without impacting visibility
- See Interim Visibility Policy at <http://www.arb.ca.gov/msprog/ordiesel/documents/interim%20vis%20policy.pdf>

2010 Retrofit Requirements

- Retrofit requirements not currently being enforced
- If retrofitting now, select vehicles to retrofit where the retrofit does not block operator visibility
- If no vehicles in the fleet can be retrofit without blocking operator visibility, the fleet is exempt from retrofit requirements for 2010

Operator Visibility

- Visibility defined by an operator of average height and weight, looking in any direction around a vehicle
- Retrofit installation should not block their view of surroundings in any direction

Installations that Create Masking



Installations that Create Masking 2



Installations without Masking



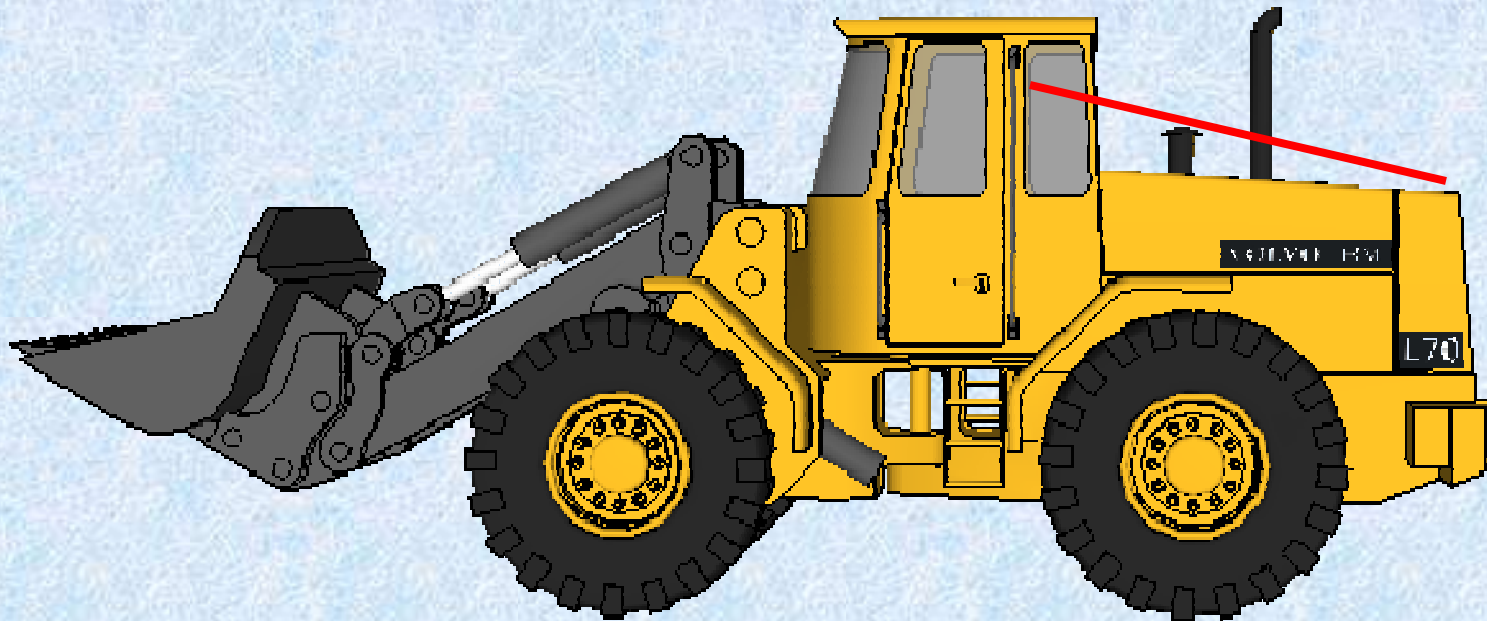
<http://www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm>

Installations without Masking 2



Determining Visibility

- For cases that are unclear, use the guide at www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm



Claiming an Exemption

- Follow exemption guide and application
- Submit paperwork to ARB

Vehicle Profile



Engine Compartment Profile



Rear Views of the Vehicle



Top View of Engine Compartment



Engine compartment with access doors open



Dimensions of engine components, specifically any muffler components



<http://www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm>

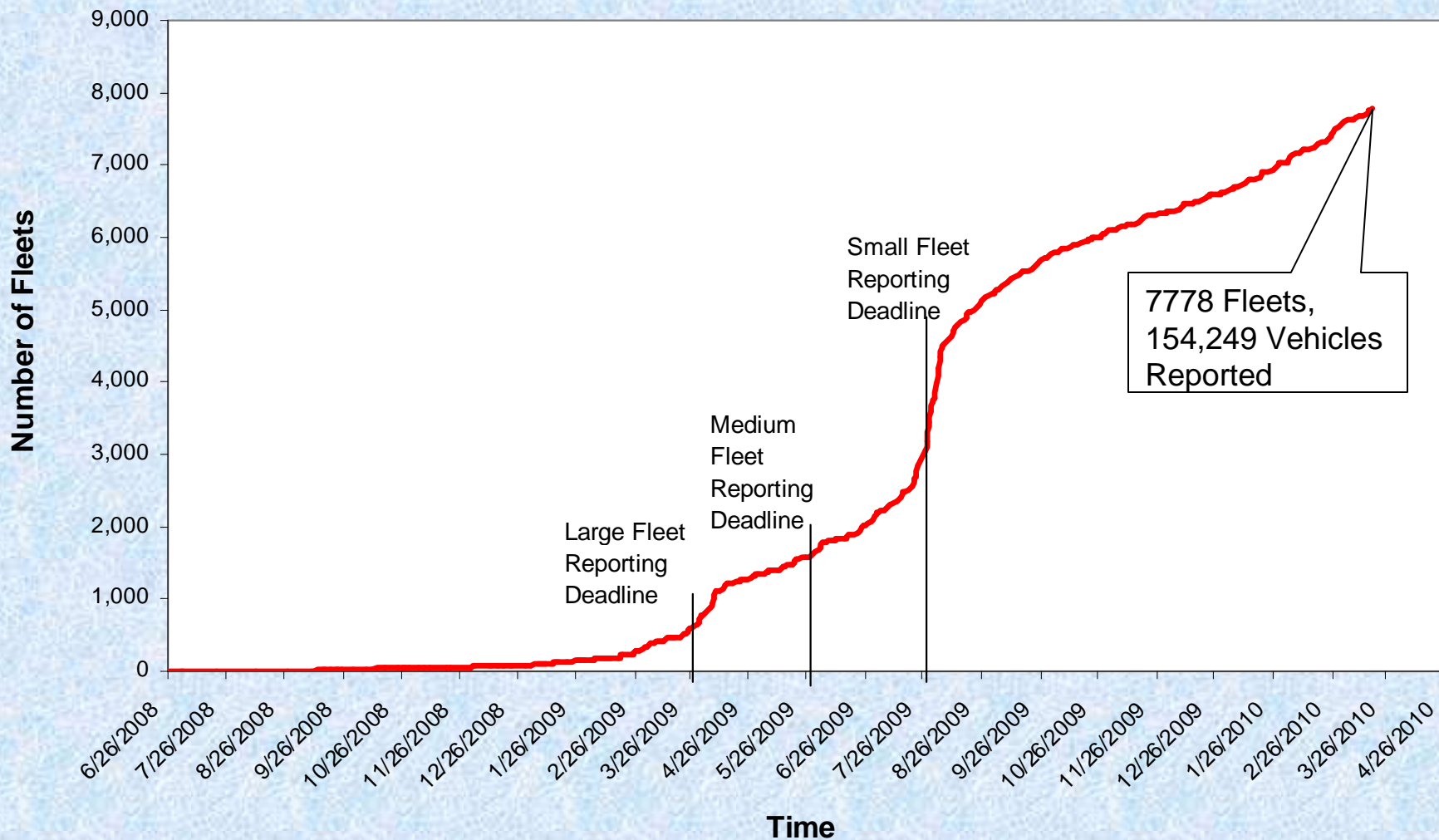
Safety Exemption Application

- Original process proposed at Nov. 2009 ORIAG meeting:
 - Fleet hire Professional Engineer to assess multiple locations for retrofit
 - If no retrofit possible without impairing visibility, complete exemption form and submit to ARB
- Revised streamlined process:
 - Fleet completes application form with vehicle info. No need to hire PE.
 - ARB posts on-line
 - Retrofit manufacturers/installers respond within 30 days
 - <http://www.arb.ca.gov/msprog/ordiesel/vdecexempt.htm>

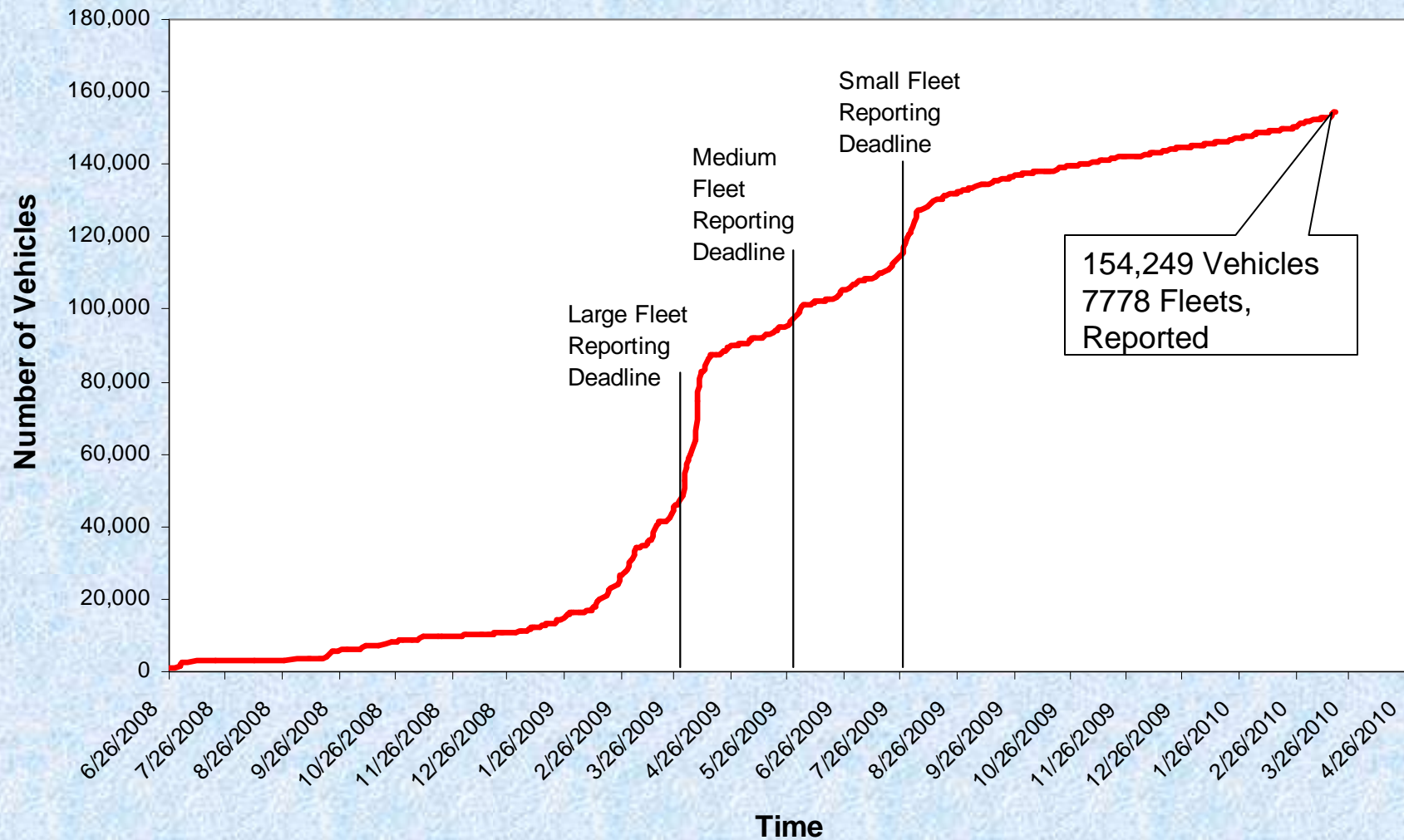
Reporting Update



Fleets Reported (3-18-2010)



Vehicles Reported (3-18-2010)



Summary of Recently Approved Regulation Amendments



Regulation Amendments: January 2009

- Extend double credit for early PM retrofits to January 1, 2010
- Simplification of changing fleet size requirements
- Other minor clarifications
- No 15-day modifications
- Now in effect

Regulation Amendments: July 2009 AB 8 2X

- New reduced activity and reduced horsepower credits
- Changes in BACT schedule
- No Administrative Procedure Act (APA) requirements
- Now in effect

Regulation Amendments:

July 2009 Other Amendments

- Early retrofits:
 1. Double credit towards NOx requirements for NOx retrofits
 2. Extend double credit for PM retrofits in medium/small fleets to March 1, 2012
 3. Lifetime turnover exemption for early retrofit
 - Limited to 15% of a fleet's total horsepower
- Early repowers:
 - Turnover credit for repowers done before turnover required

Regulation Amendments:

July 2009 Other Amendments Cont'd

- 15 day modifications
 - VDECS That Impairs Safe Operation of Vehicle
 - Change “impossible” to “technologically infeasible”
 - Clarify 2013 BACT requirements
 - Fleets not subject to retrofit or turnover requirements in 2012 not required to meet the 36 % retrofit rate or 14.4 % turnover rate in 2013
 - Still do 20% retrofit, 8% turnover
 - Order of Turnover
 - Fleets can get credit for installing NOx VDECS before all Tier 0 and dirtiest Tier 1 engines are turned over

ORIAG Member Discussion

DOORS / Reporting Updates



Recent DOORS Updates

- 2010 Compliance Page
- Reporting AB 8 2X Reduced Activity and Reduced Horsepower Credits
- Hour Entry (Low Use, Fleet Averages)
- Aggregating Sub-fleets

2010 Compliance Summary

Fleet is not 2010 Compliant

Fleet must: Turnover 5,978 Hp or meet the NOx fleet average.
May be met with [early credit](#) or [vehicle turnover](#)

Fleet Size:
First Compliance Date:
Requirements:

Large
March 1, 2010
NOx and PM

2010 NOx Requirements:	Not Met
Nox Fleet Average:	Not Met
Nox BACT Requirements:	Not Met
Required BACT Turnover: (8% of Fleet Horsepower)	10,474 Hp
Current Turnover Credit:	4,496 Hp

2010 PM Requirements:	Met
PM Fleet Average:	Not Met
PM BACT Requirements:	Met
Required BACT Retrofits: (20% of Fleet Horsepower)	26,186 Hp
Current Retrofit Credit:	42,972 Hp

Turnover Requirements: **5,978 Hp**
If you meet the fleet average before accruing this turnover, you have met the 2010 requirements.
For more information on accumulating turnover credit see the [2010 guided to compliance](#) or the [early credit guide](#)

Carryover PM Credit: **16,786 Hp**
Carryover credit is applied to 2011 requirements
Unused Reduced Activity Credit expires if not used in 2010 or 2011.

Credit Summary

- Example of portion of a report for one fleet
- Credit in horsepower units

Nox Credit

2006-2010 Retirement:	391
Reduced Activity:	6,401
Early Replacement:	0
Repowers	4,931
2009-2010 Turnover:	0
Total:	11,724

AB 8 2X: Reduced Horsepower

Include all vehicles the fleet owned since March 1, 2006, in the fleet report in DOORS

Line #	EIN	Veh serial num	Your veh num	Type	Manufacturer
10				Bore/Drill Rigs	A&L

Edit	Delete	Sell/Retire	Line #	EIN	Veh serial num	Your veh num	Type	Veh Manufacturer	Veh Model	Veh MY	Purchase
Edit	Delete	Sell/Retire	9	KM9A87	siudhr89479uh	29348	Bore/Drill Rigs	A&L	23423423	2009	1986-0
Edit	Delete	Sell/Retire	8	HL5B79	345345345cgb	4345	Skid Steer Loaders	A&L	869NA005	2003	1999-0
Edit	Delete	Sell/Retire	7	MA8H35	7898jlooooo	4345	Skid Steer Loaders	A&L	869NA005	2003	1999-0

AB8 2X: Reduced Activity

Three Steps

1. Online in DOORS
2. Complete ARB forms
3. Mail in ARB form with fleet records

<http://www.arb.ca.gov/msprog/ordiesel/activity.htm>


Reporting Reduced Activity: Online

Hours of operation:

Model	MY	2007 Hours	2010 Hours
350G	2002	476	351
456	2009	176	158
140G	1981	190	205

Reporting Reduced Activity Forms

Complete ARB form, and include fleet records (paper and/or electronic)

 **AIR RESOURCES BOARD** Reduced Activity Records Application
Fleet Information Form / Cover Sheet

To submit a request for Reduced Activity/Credit, please fill out this form and attach the applicable forms:

Reduced Activity Credit Summary Sheet from DOORS and
Reduced Activity Indicator Records: Only one of sections (A) through (G)

Then send your written request to:

Off-road Diesel Vehicle Regulation
Reduced Activity Records Application
Floor 7, MODO
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Responsible Party and Contact Information

Please fill out all the fields below. Failure to fill out this page in its entirety may result in a rejected application, and a delay in receiving reduced activity/credit.

Company / Agency Name	
DOORS ID Number	
Fleet Owner / Manager	
Contact Phone Number	
Contact Email	
Mailing Address	Name
	Address 1
	Address 2
	City, State, Zip



<http://www.arb.ca.gov/msprog/ordiesel/activity.htm>

Reduced Activity: Reporting

What Records Are Required?

- Hour meter logs, vehicle tracking software
- Payroll records, tax records for employees
- Fuel receipts, tax records for fuel
- Revenue from tax receipts
- Shipping records for goods / services
- Production / services records

Reporting Low Use

Not Low Use	Year to Year	Year to Year Outside	Designated	Designated Outside	EIN
<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	AN8D86
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	gN4G66
<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	GY9X45
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	HA3T95
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	HL5B79

Moving Forward

- DOORS updates in the future will depend largely on any changes to the regulation.
- Other thoughts, questions, ideas?

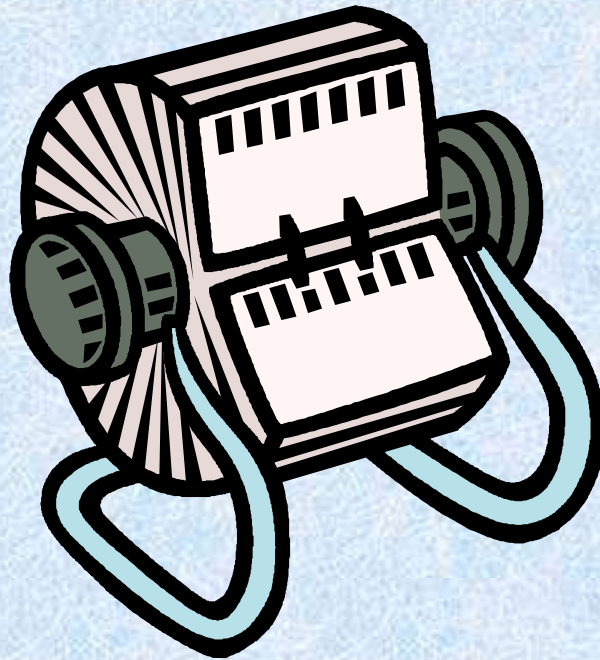
Public Comment Period

Email for sending comments:

mbaker@arb.ca.gov



ARB Website and Contacts



California Environmental Protection Agency

Air Resources Board



Off-Road Contacts

Knowledge Center - <http://www.arb.ca.gov/msprog/ordiesel/knowcenter.htm>

Off-Road Regulation - www.arb.ca.gov/msprog/ordiesel

Diesel Help Line: 1-866-6DIESEL (1-866-634-3735)

DOORS Help Line: 1-877-59DOORS (1-877-593-6677)

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Meeting Wrap Up and Adjourn

